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May 2, 2019

BY ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: Marquez v. Hoffman, et al., No. 18-cv-07315 (ALC) (GWG)

Dear Judge Carter:

This Office represents Defendants Hon. Saliann Scarpulla, Hon. George Silver, Hon. Lawrence Marks, John McConnell, Lauren Desole, Kay-Ann Porter, Lisa Evans, Hon. Lori Sattler, Denis Reo, Lucian Chalfen, Hon. Eugene Fahey, Hon. Paul Feinman, Hon. Michael Garcia, Hon. Jenny Rivera, Hon. Leslie Stein, Hon. Rowan Wilson, and Chief Judge Janet DiFiore, and the State of New York (collectively, the "State Defendants"), in the above-referenced action, brought by Plaintiff Alexis Marquez ("Plaintiff"). Per this Court's order, dated April 1, 2019, ECF No. 68, we write to propose the following briefing schedule for the State Defendants' anticipated motion to dismiss:

- Moving brief: Friday, June 21, 2019
- Opposition brief: Monday, July 22, 2019
- Reply brief: Monday, August 5, 2019

Plaintiff does not consent and, rather proposes that Defendants move by June 5, 2019, Plaintiff opposes by July 5, 2019, and Defendants reply by July 12, 2019. Plaintiff's asserted basis for her shorter proposed schedule is that Defendants "should have moved many, many months ago to dismiss," notwithstanding the fact that the Second Amended Complaint—the operative pleading—was filed on April 22, 2019. ECF No. 72.

The State Defendants request the minimally longer briefing schedule because they anticipate moving to dismiss 19 causes of action, as pleaded in Plaintiff's 716-paragraph Second Amended Complaint, and due to counsel's commitments and deadlines in other matters.

We appreciate the Court's consideration and its attention to this matter.

Respectfully submitted,

/s/ Monica Hanna

Monica Hanna
Assistant Attorney General

cc: Counsel for all parties (by ECF)